



Feedback on Draft Plan + Plan Updates

Public Comment Period

The public comment period for *Housing Lynn: A plan for inclusive growth* began on January 7th, 2021. Originally slated for two weeks, the comment period was extended from January 21st to January 28th to allow three full weeks for the public to review materials and provide written comment via email. In addition to the full draft plan, a robust executive summary was made available in English and Spanish.

A total of 96 emails were received, including 6 in Spanish. There were four comment letters from the following organizations: the Greater Lynn Chamber of Commerce, Harborlight Community Partners, Lawyers for Civil Rights, and the North Shore Realtors. There were two organized community comment campaigns: Twenty-six commenters sent a version of a letter drafted by the New Lynn Coalition and 30 commenters did the same with a letter by Lynn United for Change. The latter group also sent a comment letter directly with 282 signatures.

What follows is a brief summary of the input received and changes made to the plan in response.

What We Heard

Housing Lynn Public Comment Focus Areas	
Category	Count
N/A to Plan	3
Application Requests	8
Support As Is	2
No More Affordable Housing	2
Public Process	4
Data & Framing	3
Changes to Recommendations	61
New Recommendations	8
Insufficient Target	70
Total Comments	161

Counts do not add up to the total number of emails as some included comments in multiple categories

For purposes of analysis, public comments fall into eight categories: comments not applicable to Housing Lynn, requests for Affordable Housing applications, comments voicing support for the plan as is, arguments for no more Affordable Housing, concerns about the public process, suggestions on data and framing, suggested changes to draft recommendations, suggested new recommendations, and concerns that the target is insufficient and inappropriate. Some emails included comments on multiple subjects.

The vast majority of comments focused on the Affordable Housing production target and plan recommendations. Comments on the former included suggestions that the target be set at a deeper level of affordability than 80% of AMI and that it be a higher percentage of new development. Comments on draft plan recommendations included many comments of support and many suggesting amendments. The most numerous comments were to recommend that tenant protections, inclusionary zoning, and mechanisms to negotiate community benefits be put in place prior to rezoning for smart growth; apply the Equity Impact Assessment to all new residentially development, not just that on City-owned land; and use public land and resources for deeply Affordable Housing that meets the needs of current Lynnners.

Key Updates to Plan

The final Housing Lynn plan reflects numerous updates based on community input during the public comment period. Some of these changes are minor, such as copyedits, but most are meaningful. What follows is an overview of substantive changes made to the plan.

Data + Framing

Language was added to the assessment of Housing Need and Demand to highlight the disparate racial impacts of the housing shortage and affordability crisis, COVID-19, and displacement risk. To do this, additional data on median income, tenure, and cost burden by race and ethnicity was collected and analyzed. Data on school children experiencing homelessness from the Lynn Public Schools was added to the same section of the plan. The section of the plan on school enrollment was also updated to note the positive effects Affordable Housing can have on school learning and student achievement. Finally, the Subsidized Housing Inventory for Lynn was updated to reflect the State's 2021 count.

Affordable Housing Production Target

The draft plan included a target of 15% of new development be Affordable Housing for households with incomes at or below 80% of AMI. In response to comments that this was not responsive to local need, the target has been adjusted to 10% of new development will be Affordable Housing for households with incomes at or below 50% of AMI and 5% will be for households at or below 80% of AMI. These targets are ambitious but reasonable given the level of public subsidy available at the local, state, and federal levels for very-low- and extremely-low-income housing.

Select Recommendations by AMI Level	
Action	AMI Range
Action 1.A: Inclusionary Development Policy	Units for households at or below 60% or 50% of AMI, depending on financial feasibility
Action 2.A: Tax incentives	Units for households at or below 60% or 50% of AMI, depending on financial feasibility
Action 2.B(1): Public land for Affordable Housing	Projects inclusive of units for households at or below 50% of AMI and, in combination with other cost offsets, at or below 30% of AMI
Action 2.D: Support of CDCs with local funding	Projects inclusive of units for households at or below 50% and 30% of AMI

While the plan does not set a specific target for units for households with incomes at or below 30% of AMI, language was added to acknowledge this need and a commitment was made by the City to support production at this affordability level given current resources and future opportunities. Language was also added to indicate that new Affordable Housing must be appropriate for a range of household types, from families in need of multiple bedrooms to seniors. Finally, the target, which was originally in the Future Development Opportunities section of the draft plan (before the Current Housing Toolkit and Recommendations sections), has been moved to after the Recommendations so that specific actions that reach particular affordability levels could be noted, as described in the above table.

Recommendations

Specific AML levels for select actions have been set as part of the Affordable Housing target, as described above. This language also appears in the descriptions of these actions in the Recommendations section of the plan. In addition, other recommendations were edited in response to public input as the below table describes.

Edits to Recommendations	
Plan Reference	New Point/Other Change to Recommendation Description
Action 1.A: Inclusionary Development Policy	Note that different policy approaches have advantages and disadvantages, such as requiring inclusionary units to be on site or offering the option of payments in lieu of units.
Action 1.B: Smart growth along major corridors	Notes that rezoning should not happen until inclusionary zoning is adopted, mechanisms for negotiation of benefits are in place, and every effort is made to implement tenant protections.
Action 1.C: Equity Impact Assessment for residential development	EIAs now apply to all new residential development, not just on City-owned land, and note the need for a public process to determine the criteria of the assessment.
Action 1D: Development approvals processes amendments	Reference to any potential change to the Special Permit Granting Authority of City Council here (and in the section summarizing the City's current zoning) has been removed.
Action 2D: Support Community Development Corporations	This strategy now specifically includes use of local funds and influence to support developers of deeply Affordable Housing, inclusive of units for households at or below 50% and 30% of AML.
Action 3.C(2): Tenant notice of events that could destabilize tenancy	States that the policy should require notification of tenants in multiple languages and make clear the consequences for landlords who fail to comply. The capacity needed for effective enforcement must be determined.
Action 4.B(2): Greater diversity of staff, boards, etc.	States that municipal government should include public housing residents and renters, in addition to people of diverse racial and ethnic backgrounds.

Why Some Comments Were Not Addressed

Substantive changes to draft recommendations that make them infeasible to implement, change their intention, or are illegal were not incorporated into the final plan. The final plan also does not reflect comments asking for recommended actions to be omitted or new recommendations to be added for the following reasons:

- Each request of this nature came from only one commenter so there was no consensus on these suggestions.
- New recommendations are not supported by this plan's analysis nor were they vetted by the community.
- Comments indicating a lack of support for recommendations were either based on unfounded concerns or on concerns already acknowledged by the plan, which must be addressed during implementation.

Where to Find Changes in the Final Draft

Find the changes described above in the final Housing Lynn plan and Executive Summary document on the following pages.

Location of Substantive Changes in Final Housing Lynn Plan & Executive Summary	
Plan	Page #
Additional data on income by race and ethnicity	28
New language noting connection between COVID-19 and overcrowding	33
Additional data on disparities between income and tenure by race and ethnicity	37
Additional data on disparities in cost burden rates by race and ethnicity and tenure	39
New language noting disparities in displacement risk based on the geography of race and ethnicity, tenure, and income	46
New language noting disparate impacts of eviction on Lynners of color since they tend to rent at higher rates and have lower incomes	47
New language noting the connection between COVID-19 and eviction	48
New language noting the connection between COVID-19 and foreclosure	48
New language noting the connection between COVID-19 and homelessness	50
Additional data on homelessness from Lynn Public Schools	50
Omission of language noting which local entities more often serve as special permit granting authority	66
New language noting the positive impact of Affordable Housing on overcrowding and potential to improve school conditions	76
Changes to Action 1.A: Inclusionary Development Policy	107
Changes to Action 1.B: Smart growth along major corridors	110
Changes to Action 1.C: Equity Impact Assessment for residential development	111
Changes to Action 1D: Development approvals processes amendments	112
Changes to Action 2D: Support Community Development Corporations	118
Changes to Action 3.C(2): Tenant notice of events that could destabilize tenancy	122
Changes to Action 4.B(2): Greater diversity of staff, boards, etc.	124
Addition of Chapter 40R under Other Housing Actions for Consideration section of the Appendix	144
Changes to the Affordable Housing production target	130
Executive Summary	Page #
New language noting some housing challenges disproportionately impact people of color due to lower incomes and higher rates of renting	12
Additional data on homelessness from Lynn Public Schools	15
New language noting the disparities in displacement risk based on the geography of race and ethnicity, tenure, and income	15
Changes to Action 1.A: Inclusionary Development Policy	28
Changes to Action 1.B: Smart growth along major corridors	28
Changes to Action 1.C: Equity Impact Assessment for residential development	28
Changes to Action 1D: Development approvals processes amendments	29
Changes to Action 2D: Support Community Development Corporations	31
Changes to Action 3.C(2): Tenant notice of events that could destabilize tenancy	33
Changes to Action 4.B(2): Greater diversity of staff, boards, etc.	34
Changes to the Affordable Housing production target	36